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April 8, 2013

**VIA FACSIMILE**

Hon. Colleen McMahon, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

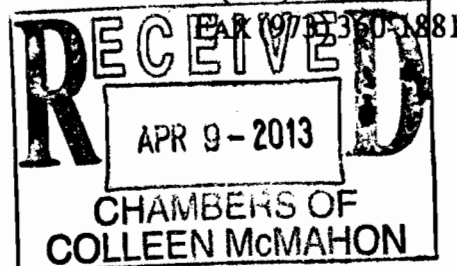
**Re: Leena Varughese, M.D. v. Mount Sinai Medical Center, et al.**  
**Civil Action No. 12 Civ. 8812 (CM)**

Dear Judge McMahon:

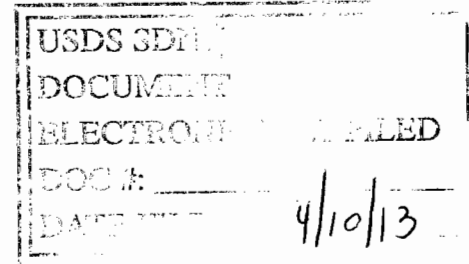
I represent Leena Varughese, M.D., in the above-referenced employment matter. I respectfully request that the Court's Scheduling Order in this matter be modified. I have my adversary's consent in making this request.

Plaintiff has served her written discovery responses and produced nearly 1,200 pages of documents. It is anticipated that defendants will be producing their written discovery responses this week. The Scheduling Order next provides that plaintiff's deposition is to be completed by April 26, 2013.

This matter has been assigned to the Court's mediation program. The parties have been contacted by the assigned mediator for purposes of scheduling the first mediation session. Plaintiff respectfully requests that the parties be permitted to mediate the matter prior to incurring the substantial expense of depositions and expert reports. Plaintiff further requests that the deadline for plaintiff's deposition be set for thirty (30) days after the completion of mediation so that defendants have sufficient time to prepare for same if mediation is unsuccessful. Defendants consent to this request.



Reply to New Jersey



**MEMO ENDORSED**

4/9/2013  
*[Handwritten signature]*

Hon. Colleen McMahon, U.S.D.J.  
April 8, 2013

We thank the Court for its consideration of this Request and of this matter..

Respectfully submitted,

Ronald J. Wronko

cc: Rory McEvoy, Esq. (via facsimile)